

Law Offices Of

COHN & ROTH

100 E. OLD COUNTRY ROAD MINEOLA, NEW YORK 11501
(516) 747-3030 ☎ FAX (516) 747-3046

MICHAEL H. COHN
WILLIAM M. ROTH

MICHAEL C. NAYAR
EDWARD C. KLEIN
KEVIN MACTIERNAN

March 24, 2017

Chambers of the Hon. Nancy Hershey Lord
United States Bankruptcy Court
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

RE: Debtor: Michael Proscia and Dianne Proscia
Case No.: 16-41700-nhl
Loan No.: x9626

Dear Judge Lord:

This firm represents U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust c/o Caliber Home Loans, Inc. (hereinafter "Caliber"), a secured creditor in connection with the above-referenced bankruptcy matter. Please allow this letter to serve as a status update to the pending loss mitigation matter.

On 02/06/2017, we reached out to Debtors' Counsel to advise that, upon completion of Caliber's review of the documents provided to us on 01/31/2017, the following items were still needed:

- (i) Proof of Income for Michael – Need 30 days consecutive, current paystubs with YTD earnings (the previously submitted paystubs did not cover a 30 day consecutive period and were also nearing expiration upon receipt; paystubs were dated 11/20/2016 - 11/26/2016, 11/27/2016 - 12/03/2016, and 12/11/2016 - 12/17/2016; paystubs expire with 60 days after issue date);
- (ii) Proof of Income for Alyssa – Need 30 days consecutive, current paystubs with YTD earnings (the previously submitted paystubs were enlarged so much that the name, address, employer info, etc was not visible); and
- (iii) Proof of Income for the son – Is the Borrower's son contributing to the household? If so, he will need to submit a letter of contribution, signed and dated, indicating exact dollar amount of contribution, along with 30 days consecutive, current paystubs with YTD earnings, verification of occupancy (i.e. utility bill or bank stmt). If the son is not contributing, please provide us with a letter, signed and dated, indicating same.

On 02/14/2017 and again on 03/02/2017, we followed up with Debtors' Counsel requesting an update as to when we can expect to receive the above-needed items. We reminded Debtors' Counsel that continued delays will result in the previously submitted items to expire and need to be re-submitted. In an effort to avoid that, we asked that the Debtors please provide us with these items as soon as possible.

Page 2
March 24, 2017

On 03/02/2017, Debtors' Counsel advised that she provided us with documents on 02/20/2017 for Caliber's review. We then advised Debtors' Counsel that the 02/20/2017 submission was received, but it was only an online printout showing bank deposits, which was not what was needed.

Caliber, through its Counsel, will be in attendance at the Loss Mitigation Status Conference, presently scheduled for 03/28/2017. If the Debtors are still interested in pursuing loss mitigation, it will be Caliber's intent to request that this Court establish a firm deadline as to when the Debtors are to submit a complete, updated financial package. Alternatively, if the Debtors are no longer interested in pursuing loss mitigation, it will be Caliber's intent to request termination.

Respectfully submitted,
Cohn & Roth

By: /s/ Carrie Altenburg
Carrie Altenburg
Paralegal

cc: Michael Proscia and Dianne Proscia, Debtors (via First Class Mail)
Rachel Blumenfeld, Esq., Counsel for the Debtors (via ECF and First Class Mail)